

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TEAL PEAK CAPITAL, LLC;

Plaintiff,

v.

ALAN BRAM GOLDMAN;

Defendants.

Civil No. 3:20-cv-01747 (PAD)

**BREACH OF CONTRACT; SPECIFIC
PERFORMANCE OF CONTRACT;
REIMBURSEMENT OF FUNDS, COSTS
AND EXPENSES**

JOINT PROPOSED SCHEDULE

TO THE HONORABLE COURT:

The captioned parties (“the parties”), through their counsels of record and pursuant to the Order for Joint Proposed Schedule issued by this Court (Docket No. 20), respectfully submit their Joint Proposed Schedule as follows:

I. Jurisdictional Issues

There are no jurisdictional issues before this Court.

II. Consent to Proceed before a Magistrate Judge

The parties agree that this case should **not** be assigned to a magistrate judge for all purposes.

III. Settlement.

The Parties have been unable to engage in any settlement discussion for lack of interest on part of the Defendant.

IV. Compliance with Initial Disclosures

The Parties will submit their Rule 26 (a)(1), Fed. Civ. P., initial disclosure statement to each other by letter on **May 20th, 2021**. Each Party reserve its right to submit additional evidence throughout the discovery provided that it was not in possession of the same or readily available at the time of the initial disclosure exchange.

V. Electronic Discovery and Proposed Agreements

A. Plaintiff

1. Plaintiff will submit an Interrogatory and a Request for the Production of Documents to Defendants no later than **June 1st, 2021**. A Request for Admission will be served during the discovery period.

2. Plaintiff hereby certifies that it considered potential electronic discovery issues pursuant to Rules 26(a)(1)(B) and 26(f)(3) and (4). Plaintiff proposes that any document in original electronic format be produced in PDF form but original paper documents shall be produced in paper form.

B. Defendant

1. Defendant agrees with Plaintiff's due date for its First Set of Interrogatories and Request for the Production of Documents. Defendant will serve its answers and any objections within 30 days after being served with the interrogatories.

2 Defendant hereby certifies that it considered electronic discovery issues pursuant to Rules 26(a)(1)(B) and 26(f)(3) and (4). Defendant agrees that any document in original electronic format be produced in PDF form, but original paper documents shall be produced in paper form.

Parties Joint Scheduling Time

1. Time estimated for filing motions, disposing of pending motions and anticipated motions

Amendments- Parties reserve their right to request leave to this Court to amend initial allegations and will file any amended pleadings no later than May 28, 2021.

Each Party reserves their right to submit any related Motions and Defenses under Federal Rules of Civil Procedure and Local Rules that may apply.

VI. Discovery Timetable

Plaintiff submits the following discovery timetable to the consideration of the Court:

1. Deadline to conclude written discovery is **September 20th, 2021**.
2. Deadline to complete fact witnesses' depositions is **October 20th, 2021**.
3. Deadline to produce expert reports & *Curriculum Vitae*, if any **November 20th, 2021**.
4. Deadline to complete expert witness depositions is **February 22th, 2022**.
5. All discovery is to be completed by **May 20th, 2022**.
6. Deadline to file dispositive motions is **July 20th, 2022**.

VII. Related Cases Filed

None.

VIII. Other Matters

- A. The parties will explore settlement during the discovery process.
- B. Defendant agrees with the dates set forth in the present Schedule. However, Defendant's consent is contingent on this Honorable Court's ruling on the Motion to Disqualify Counsel for Plaintiff and Memorandum of Law in Support Thereof (Docket No. 24). This is to say, Defendant will not commit to any dates so that new counsel is not tied to dates that he or she may not have available in his or her calendar.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 19 day of April, 2021.

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall notify all counsels of record.

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